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February 28, 2024

The Honorable Craig T. Goldblatt, U.S.B.J.
United States Bankruptcy Court for the District of Delaware
824 Market Street. N.
3rd Floor, Courtroom 7
Wilmington, DE 19801

Re: Team Systems International, LLC - Ch. 11 No. 22-10066-CTG; Adv. No. 23-50004-CTG –
Creditors' Objection to Pro Hac Vice Admission of Randy Michael Mott, Esq.

Dear Judge Goldblatt:

Please accept this letter in lieu of a more formal objection to the *pro hac vice* admission of Randy Michael Mott, Esq.

Mr. Mott does not possess the character and fitness necessary to be granted the privilege of *pro hac vice* admission to the Bankruptcy Court for the District of Delaware. And, Creditors hereby request that the Court defer its *pro hac vice* determination until hearing on the Motion to Vacate, which is presently pending before your Honor – as there are overlapping issues relating thereto.

Notably though, Mr. Mott's *pro hac vice* motion fails to disclose his familial relationship with his clients. Upon information of belief, Mr. Mott is Deborah Mott's ex-husband and Christopher Mott's father.

Mr. Mott's *pro hac vice* motion also fails to disclose his true mailing address. Instead, upon information and belief, Mr. Mott resides in Poland, and also uses a Washington, DC address (1629 K Street NW, Suite 300, Washington, DC 20006). However, the *pro hac vice* motion uses an Orlando Florida address (415 E. Pine St. Apt 1218 Orlando, FL 32801), which Creditors believe is his son, Christopher Mott's residence.

Mr. Mott, joined by his co-counsel, has also knowingly made numerous and substantive false statements to this Bankruptcy Court in the Motion to Vacate – statements that are directly contradicted

by numerous transcripts and other documents appearing on the Bankruptcy Court's public docket. The details of these false statements will be addressed at length in Creditors' response to the Motion to Vacate, which is presently due to be filed by March 5 2024.

Mr. Mott has also filed a vexatious ethics complaint against Creditors' counsel with the Delaware Supreme Court Office of Disciplinary Counsel – again, with known false statements that are directly contradicted by the transcripts and other documents appearing on the bankruptcy Court's public docket. A sealed copy of Mr. Mott's ethics complaint (which is privileged) is attached hereto marked as **Exhibit A**.

Mr. Mott, along with his co-counsel, has also twice been asked to accept service of testimony subpoenas and to agree to appear before the Bankruptcy Court in person and to submit to examination live and under oath –But, Mr. Mott and his co-counsel have refused to agree. Copies of the relevant correspondence with Mr. Mott and his co-counsel is enclosed herewith marked as **Exhibit B**.

Mr. Mott has also stated that he is in the process of filing additional ethics complaints. *See Id.*

In light of the foregoing, Creditors hereby object to the *pro hac vice* admission of Randy Michael Mott, Esq. And again, Creditors hereby request that the Court defer its *pro hac vice* determination until hearing on the Motion to Vacate which is presently pending before your Honor.

Respectfully,

/s/ Jenny R. Kasen

JENNY R. KASEN

JRK:jk
Via ECF
Enclosure(s)